This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

MIM Date 2/15/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends No Action for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A No Further Action recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the No Further Action Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely

Daryl F. Koch FFA/CO Manager

DK/jc

cc: Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID

SITE 027 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Mound Near East Portland/East Ogden Intersection

Site ID:

027

Operable Unit:

10-08

Waste Area Group:

10

I. Summary – Physical Description of the Site:

Site 027 consists of a small excavated depression and mound located approximately one mile southeast of the Central Facilities Area (CFA), near the East Portland/East Ogden intersection. This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are . The GPS coordinate system is listed as North American Datum 27,

Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

INEEL WAG 10 and Cultural Resources investigated this site on June 6, 2001. The investigation revealed that Site 027 contains a small depression and mound that appear to have been a backhoe excavation. The depression is approximately the same size as the mound and both resemble numerous other depressions and mounds across the INEEL. Interviews with INEEL Environmental Restoration Environment Safety and Health (ER ES&H) personnel reveal that the depression and mound probably resulted from geotechnical investigations (test excavations) for potential borrow pits or fill material used in road building and miscellaneous construction activities at the INEEL.

No visible road leads to the site; there is no indication of stained or discolored soil, buried material, or visible debris near or surrounding the depression or mound. Native grasses and sagebrush are fairly well established in the depression; however, the weedy and sparse vegetation on the mound is typical of other mounds found across the INEEL. The difference in vegetation is likely because the mound soil is from the "calcic" horizon, which has a low nutrient content and is not conducive to plant growth. There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. The description of the site conditions is based on recent site investigations and interviews. No field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with INEEL Cultural Resource and ER ES&H personnel, and photographs revealed no evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 027 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility of contaminant levels at this site being above risk-based limits is remote. Field investigations and visual observations of the debris and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY – Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote, abandoned area with no viable pathways or receptors. The site is located in the southwestern section of the INEEL; approximately one mile southeast of CFA; near the East Portland/East Ogden intersection. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants. The small depression and mound are similar to numerous others located across the INEEL that served as geotechnical test pits. Neither the depression nor mound appear to contain anything that would pose a potential risk to human health or the environment.

| Signatures: Wan and Local | # Pages: 16 Date: 08/20/01 |
|----------------------------------|-----------------------------------|
| 1 101/1/1 | DOE WAG Manager: |
| Approved By: Miss 1 Hold 9-30-04 | Independent Review Sent Rong 70 0 |

Date Received:

| DECISION STATEMENT |
|---------------------------|
| (DOE RPM) |

Disposition: 5, to 027, 5 clussified as a no action site

This determination will be recorded in the site database and listed in the 2005 INEEL Integrated

5-Year Plan.

1/14/05

Date: 1/14/05 # Pages: 1011

Name: Kuthlaca Hoin Signature: Ilathleen & Havin

| DECISION STATEMENT |
|---------------------------|
| (EPA RPM) |

site -027

Date Received:

Disposition:

After re-review of the supporting information EPA concurs that this is a no action site.

| Date: 9-23-04 | # Pages: | . 00 |
|------------------|------------|------|
| Name: Denny Faul | Signature: | 11/2 |

Name:

| DIALI |
|--|
| DECISION STATEMENT (IDEQ RPM) |
| Date Received: May 8, 2002 |
| Disposition: |
| |
| Site 027 |
| Site 027 is small depression and adjacent mound of approximately the same size located about 1-mile southeast of the Central Facilities Area (CFA). Interviews indicate this type of co-located mound and depressions are common on the INEEL and their origin is probably from geotechnical investigations. There is no visible road to the site and there is a lack of evidence suggesting the presence of contamination (no stained soils, buried materials, or visible debris). Although EPA earlier wanted an investigation to ensure debris was not buried at this site, the State does not at this time believe there is sufficient cause to warrant this action. |
| The State recommends this site for No Further Action. |
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| Date: 1/264 # Pages: |

Signature:

Loch

| PROCESS/WASTE WORKSHEET | /ORKSHEET | |
|---|---|--|
| SITE ID: 027 | PROCESS: | Depression/Mound Near East Portland/East Ogden Intersection |
| | WASTE: | Depression and Mound |
| Col 1 Processes Associated with this Site | Col 2 Waste Description & Handling Procedures | Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process |
| One small excavated pit and mound likely related to INEEL activities. | Excavation pit and mound likely used for road building operations or geotechnical test investigations conducted by INEEL personnel. | Artifact: Excavation Pit and Mound Location: The site is located in the southwestern section of the INEEL; approximately 1 mile southeast of the Central Facilities Area (CFA); near the East Portland/East Ogden intersection. Description: The site contains a small excavated depression and mound likely related to INEEL operations. Anecdotal information suggests that the depression and mound resulted from geotechnical investigations (test excavations) for potential borrow pits. The material may have been used as fill material for road building and miscellaneous construction activities at the INEEL. The depression and mound are approximately the same size. |

| | tion | | Col 9 Overall Reliability (high/med/ low) | High |
|-----------------------|---|-----------------------------|--|----------------|
| | t Ogden Intersec | | Col 8 Qualitative Risk Assessment (high/med/ | Low |
| | ar East Portland/Eas | Mound | Col 7 Risk-based Concentration | Not Applicable |
| | Depression/Mound Near East Portland/East Ogden Intersection | Gravel Depression and Mound | Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents | None |
| | PROCESS: | WASTE: | Col 5 Potential Sources Associated with this Hazardous Material | Soil |
| CONTAMINANT WORKSHEET | SITE ID: 027 | | Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process? | None |

| Question 1. | What are the waste generation processes, locations, and dates of operation associated with this site? | |
|--|--|--|
| Block 1 | Answer: | |
| Site 027 consists of a small depression and mound that appear to be from a backhoe excavation, are approximately the same size, and are similar to numerous others found across the INEEL. The depression/mound likely resulted from geotechnical investigations (test excavations) for potential borrow pits (tested for depth to basalt, soil types, soil values, etc.). The material was used for road building and construction activities. The site is located in the southwestern section of the INEEL; approximately one mile southeast of CFA; near the East Portland/East Ogden intersection. | | |
| | | |
| Block 2 | How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) | |
| Interviews with ER ES&H and Cultural Resource personnel revealed that the depression and mound resulted from geotechnical investigations. | | |
| Block 3 | Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one) | |
| Interviews and site investigations were conducted with ER ES&H personnel and WAG 10 and Cultural Resource personnel. Photographs confirm the present condition of the site. | | |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) | |
| | 2, 5,6 Documentation about Data Disposal Dat | |

| Question 2. | What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed? | |
|--|--|--|
| Block 1 | Answer: | |
| Site 027 consists of a small depression and mound, considered industrial in nature and may have resulted from geotechnical investigations (test excavations) for potential borrow pits. The site is located in the southwestern section of the INEEL; approximately one mile southeast of CFA; near the East Portland/East Ogden intersection. | | |
| | | |
| Block 2 | How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) | |
| INEEL WAG 10 and Cultural Resource personnel confirmed that the site includes a small depression and mound related to INEEL road building/geotechnical research operations. Neither the depression nor the mound appear to contain anything that would pose a potential threat to human health or the environment. | | |
| Block 3 | Has this INFORMATION been confirmed? ☑ Yes ☐ No If so, describe the confirmation. (check one) | |
| Interviews and site investigations confirm that the excavation depression/mound is likely related to INEEL geotechnical investigations or construction type operations and does not likely pose any threat. Photographs confirm the current conditions of the site. | | |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) | |
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| Question 3. | Is there evidence that a source exists at this site? If so, list the sources and describe the evidence. | |
|---|--|--|
| Block 1 | Answer: | |
| There is no evidence that a source exists at Site 027. During a June 6, 2001 site investigation conducted by INEEL WAG 10 and Cultural Resource personnel, it was confirmed that the site contains a small depression and mound that appear to be from a backhoe excavation. There is no visible evidence of roads leading to the mound, nor indication of stained or discolored soil, buried material, odors, hazardous constituents, or debris in or around the depression/mound. | | |
| Block 2 | How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) | |
| INEEL WAG 10 and Cultural Resource personnel confirm that the depression and mound resulted from road construction or geotechnical research activities and is similar to numerous other mounds found across the INEEL used for the same purpose. Neither the depression nor the mound pose a potential risk to human health or the environment. | | |
| Block 3 | Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one) | |
| This information was confirmed by interviews and site investigations. Photographs confirm the current condition of the site. | | |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) | |
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| Question 4. | Is there empirical, circumstantial, or other evidence of migration? If so, what is it? | |
|---|--|--|
| Block 1 | Answer: | |
| There is no evidence of migration at Site 027. Site investigations reveal no visual evidence of hazardous constituents, stained or discolored soil areas, or odors. A June 6, 2001 site investigation conducted by INEEL WAG 10 and Cultural Resource personnel determined that the depression and mound likely resulted from INEEL related geotechnical investigations. There is no visible evidence of a road leading to the mound, nor indication of stained or discolored soil, buried material, or debris. | | |
| | | |
| Block 2 | How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) | |
| Visual inspections and photographs of the site show that vegetation is established and no soil staining or discoloration is present; therefore giving no indication of the presence of contaminants. | | |
| | | |
| Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one) | | |
| This information was confirmed through site inspections during a 1994 environmental baseline assessment and INEEL WAG 10 and Cultural Resource investigation. Photographs taken of the site confirm the current condition of the site. | | |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) | |
| | 2, 5,6 Documentation about Data Disposal Data QA Data QA Data Site Drawings D&D Report Unitial Assessment Well Data | |

| Question 5. | Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot? | |
|--|---|--|
| Block 1 | Answer: | |
| There is no expected pattern of potential contamination because there is no evidence of hazardous substances or radioactive materials at the site. There is no evidence of stained or discolored soil in the area, or odors. The depression and mound are approximately the same size. The pattern of hazardous constituents (organics, metals, radionuclides, etc.) cannot be estimated without further field screening or soil sampling; however, because of the nature of the site, it is highly unlikely that contaminants would be present at levels above risk-based limits. | | |
| Block 2 | How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) | |
| This information was obtained from an environmental baseline assessment conducted in 1994, and a subsequent site investigation conducted by INEEL WAG 10 and Cultural Resource personnel. Investigations reveal that the site contains a small depression and mound which are likely related to INEEL road construction or geotechnical research activities. Photographs of the site show no stained or discolored soil areas. | | |
| Block 3 | Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one) | |
| This information was confirmed through site investigations, photographs, interviews and historical research. | | |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) | |
| | 2, 5,6 Documentation about Data Disposal Data Capable Data Disposal Data | |

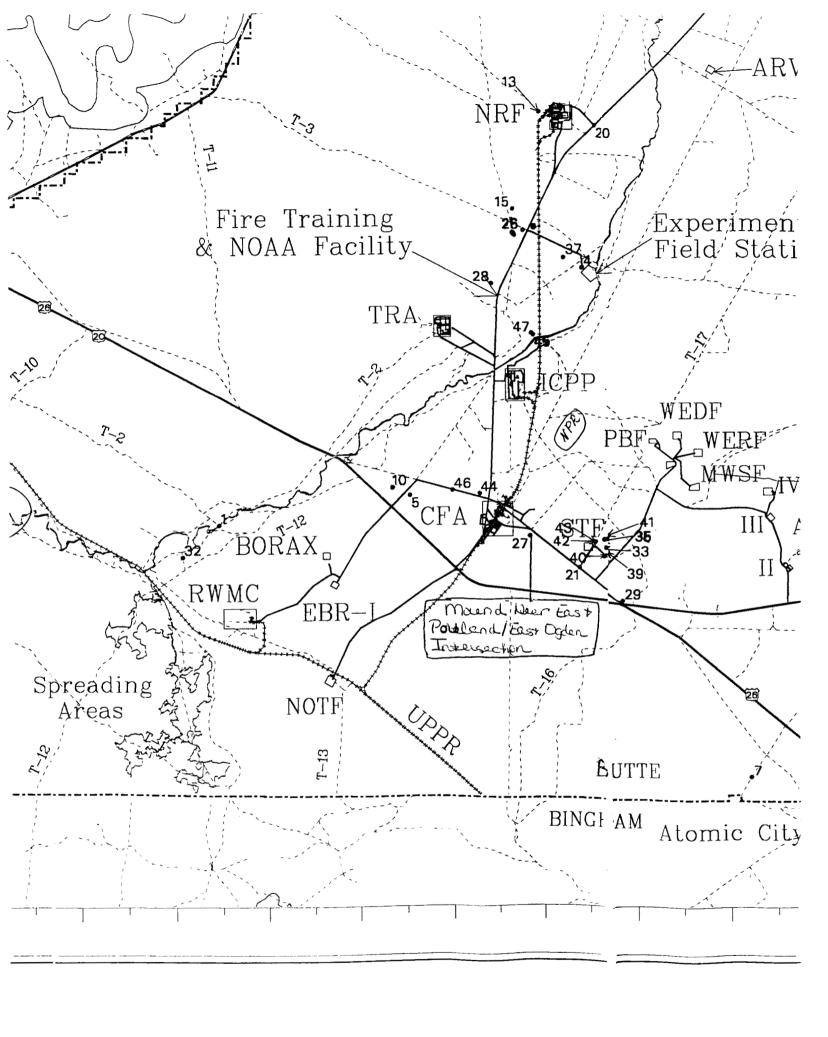
| Question 6. | Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived. |
|-------------------------------|---|
| Block 1 | Answer: |
| area. The site backhoe. The | ions and photographs indicate that Site 027 covers an approximately 20 ft by 20 ft consists of a small excavated depression and mound that appear to be caused by a re is no evidence of a source at this site or contaminated region to estimate because dence of hazardous or radioactive materials. |
| Block 2 | How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) |
| investigation of assessment n | on was obtained from a 1994 environmental baseline assessment and a recent site conducted by INEEL WAG 10 and Cultural Resources personnel. Neither the or the investigation gave any indication that the site contains anything that would stial risk. Photographs of the area show no evidence of soil staining or discoloration. |
| Block 3 | Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one) |
| Interviews, sit | e investigations, photographs and historical research confirm this information. |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) |
| | 2, 5,6 Documentation about Data Disposal Data Ess Data QA Data Site Drawings Unitial Assessment Unitial Assessment Well Data |

| Question 7. | What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived. |
|---|--|
| Block 1 | Answer: |
| is no evidence depression an potential borro evidence of a | I quantity of hazardous substance/constituents at this site is near zero, because there of any hazardous or radioactive material present. The site contains a small and mound likely resulting from geotechnical investigations (test excavations) for ow pits (tested for depth to basalt, soil types, soil values, etc.). There is no visible road leading to the site, nor indication of stained or discolored soil, buried material, or ghly unlikely that the depression or mound pose a potential threat to human health or ent. |
| Block 2 | How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one) |
| Cultural Reso | on was obtained from an environmental baseline assessment, INEEL WAG 10 and urce investigation and photographs. There is no indication that the depression or n anything that would cause potential contamination. |
| Block 3 | Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one) |
| This informati research. | on was confirmed through site inspections, interviews, photographs and historical |
| | |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) |
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| Question 8. | Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence. |
|---|--|
| Block 1 | Answer: |
| action at this s small depress mounds and o road construc to the mound, depression/m | vidence that a hazardous substance or constituent is present at levels that require site. INEEL WAG 10 and Cultural Resource personnel confirm that the site contains a sion and mound, approximately the same size, that are similar to numerous other depressions across the INEEL. The depression and mound likely resulted from INEEL tion and/or geotechnical investigation. There is no visible evidence of a road leading nor indication of stained or discolored soil, buried material, or debris in or around the ound. It is not likely that either the depression or mound pose a potential threat to or the environment. |
| Block 2 | How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one) |
| | on is based on interviews, site visitations and photographs of the area. The site shows ag or discoloration, and no odors are present. |
| Block 3 | Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one) |
| | ion was confirmed through site inspections, cultural resource historical research, d photographs. |
| Block 4 | Sources of Information (check appropriate box(es) & source number from reference list) |
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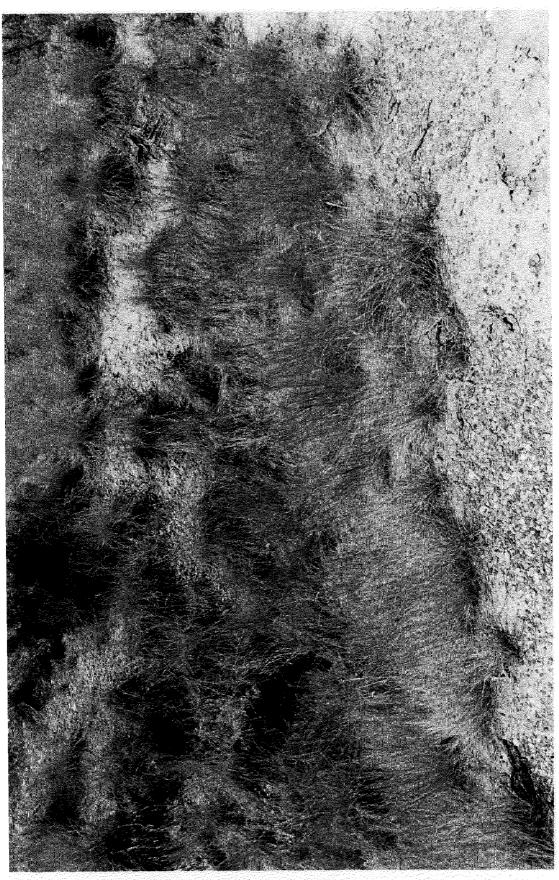
REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID- 10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6-7, 2001.
- 3. Photographs of Site 027: PN99-0424-1-14, -15.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.
- 6. Site investigation conducted by Tom Haney, INEEL Wage 10 and Brenda Ringe, INEEL Cultural Resources Management, June 6, 2001.

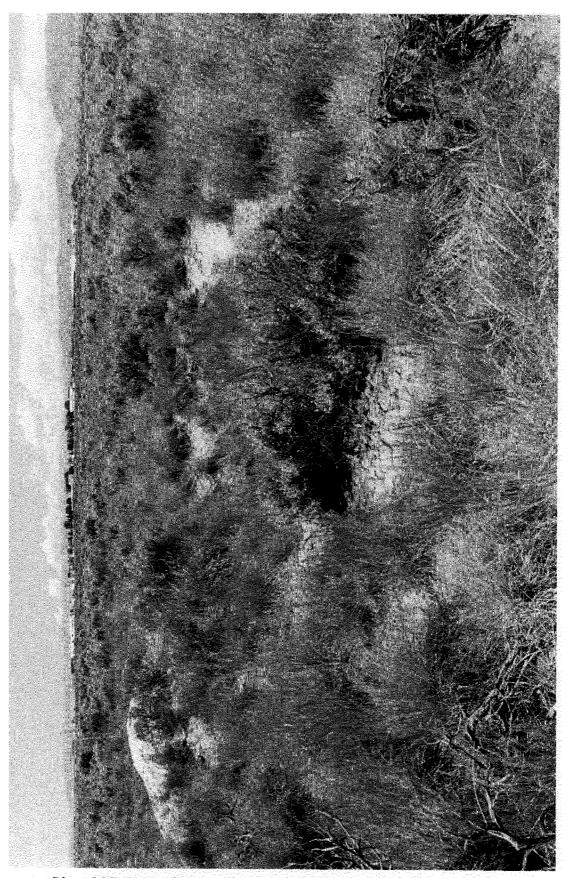


Attachment A

Photographs of Site #027



Site: 027 Mound Near East Portland/East Ogden Intersection (PN99-0424-1-14)



Site: 027 Mound Near East Portland/East Ogden Intersection (PN99-0424-1-15)

Attachment B

Supporting Information for Site #027

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

| Par | t A – To Be Completed By Observer | |
|----------|--|--|
| 1. | Person Initiating Report: Jacob Harris | Phone: 526-1877 |
| | Contractor WAG Manager: Douglas Burns | Phone: 526-4324 |
| 2. | Site Title: 027, Mound Near East Portland/East Ogden Intersection | |
| 3. | Describe the conditions that indicate a possible inactive or unreported wast condition, amount or extent of condition and date observed. A location may survey points or global positioning system descriptors shall be included to be names or location descriptors for the waste site. A small pit/mound is located east of CFA near the East Portland/East Ogded depression/mound that appears to be from a backhoe excavation was observed. | o and/or diagram identifying the site against controlled nelp with the site visit. Include any known common on intersection. During the July 1999 site visit, a proved. The GPS coordinates of this site are |
| | . The reference number for this site is 027 and can be foun | d on the summary map as provided. |
| <u> </u> | | |
| Par | t B – To Be Completed By Contractor WAG Manager | |
| 4. | Recommendation: | |
| | This site meets the requirements for an inactive waste site, requires in FFA/CO Action Plan. Proposed Operable Unit assignment is recommon WAG: Opera | vestigation, and should be included in the INEEL ended to be included in the FFA/CO. ble Unit: |
| <u> </u> | This site DOES NOT meet the requirements for an inactive waste site, included in the !NEEL FFA/CO Action Plan. | DOES NOT require investigation and SHOULD NOT be |
| 5. | Basis for the recommendation: | · · · · · · · · · · · · · · · · · · · |
| | The conditions that exist at this site indicate the potential for an inactive was or Disturbance of Suspected Inactive Waste Sites. | ste site according to Section 2 of MCP-3448 Reporting |
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| | | |
| | | |
| | | |
| | The basis for recommendation must include: (1) source description; (2) exconcern; and (4) descriptions of interfaces with other programs, as applical | |
| 6. | Contractor WAG Manager Certification: I have examined the proposed site believe the information to be true, accurate, and complete. My recommend | |
| Nar | ne: Signature: | Date: |



PROJECT DOCUMENT REVIEW RECORD

2/28/02

| DOCUMENT TITLE/DESCRIPTION: | | |
|-----------------------------|---|--|
| | REVIEWER: FPA | |
| PAGE NUMBER | | |
| | | |
| i | Site consists of a small excavation + similar volume mound. Proximity is near industrial operations. Insufficient information provided to reach a conclusion. I suggest that either the mound be disturbed or a surface geophysical survey be conducted to confirm assumption that mound contains the excavated dirt form a geotechnical investigation & the Track I be revised accordingly. | reviously agreed seessary. The ns of similar igh anecdotal e mounds or ecessary |